

IN THE UNITED STATES DISTRICT COURT FILED 07 APR 25 15:38 USDC-ORP
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA

v.

MARLENE WATSON,

Defendant.

No. CR 07- 151-HA

INDICTMENT

29 U.S.C. § 501(c); 29 U.S.C. § 439(b)

THE GRAND JURY CHARGES:

COUNT 1

(Embezzlement and Theft of Labor Union Assets)

Beginning on or about March 30, 2004, and continuing until about May 16, 2005, in the District of Oregon, **MARLENE WATSON**, while an officer of Associated Field Representatives, a labor organization engaged in an industry affecting commerce within the meaning of Title 29, United States Code, Sections 402(i) and 402(j), did embezzle, steal, and unlawfully and willfully abstract and convert to her own use, the moneys, funds, securities, property, and other assets of said labor organization, in the amount of nine thousand thirty dollars (\$9,030); all in violation of Title 29, United States Code, Section 501(c).

COUNT 2

(Falsification of Annual Financial Report Filed by Labor Union)

1. At all times material to this Indictment, Associated Field Representatives was a labor organization in an industry affecting commerce within the meaning of Title 29, United States Code, Sections 402(i) and 402(j).

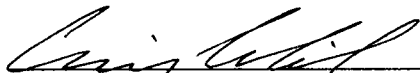
2. On or about May 27, 2005, in the District of Oregon, the defendant, **MARLENE WATSON**, did knowingly make a false statement and representation of material fact in a report

required to be filed by Associated Field Representatives with the Secretary of Labor pursuant to Title 29, United States Code, Section 431, that is, the U.S. Department of Labor, Employment Standards Administration annual financial disclosure report (LM-4); all in violation of Title 29, United States Code, Section 439(b).

Dated this 25 day of April, 2007.

A TRUE BILL

Presented by:
KARIN J. IMMERGUT
United States Attorney

A handwritten signature in cursive script, appearing to read "Craig J. Gabriel", is written over a horizontal line.

CRAIG J. GABRIEL, OSB #01257
Assistant United States Attorney